

To: Habel, Rob@DOC[Rob.Habel@conservation.ca.gov]
From: Albright, David
Sent: Tue 11/4/2014 4:41:49 PM
Subject: RE: Citadel
[AX-14-001-5743.pdf](#)

Hi Rob, after reviewing this again, the CBD claim is that Citadel disposed of produced water into the well that was only authorized for cyclic steaming (and that the approval from DOGGR indicated that produced fluids would be stored in tanks and trucked off site for treatment/disposal). I'm attaching the information/letter. We will likely tell CBD that DOGGR has primary responsibility for Class II injection well oversight and that we are following up with you to clarify what happened and whether further investigation and potential enforcement action by the State might be warranted. Thanks, David

From: Habel, Rob@DOC [mailto:Rob.Habel@conservation.ca.gov]
Sent: Tuesday, November 04, 2014 7:51 AM
To: Albright, David
Subject: Citadel

David:

I conducted a quick review of the "Indian" 1 well in San Benito County. Although I have not had time yet to locate the CBD letter, I have discovered that the Division issued a project approval letter for a cyclic steam project on May 5, 2014. An aquifer exemption was not required as the zone water tested over 23,000 mg/l. This would refute CBD's claim of illegal injection. Please let me know if you have any questions.

Thanks,

Rob